



December 21, 2022

VIA ECF

Honorable Sean H. Lane
United States Bankruptcy Court
300 Quarropas Street
White Plains, New York 10706

Lori Schwartz
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Re: 85 Flatbush RHO Mezz LLC, 85 Flatbush RHO Hotel, LLC and 85 Flatbush
RHO Residential LLC, (“Debtors”)
Chapter 11 Bankruptcy Case No. 20-23280 (SHL)

Dear Judge Lane:

In accordance with the Court’s instruction, counsel to the Debtors and counsel to TH Holdco LLC have engaged in continued discussions in an effort to resolve TH Holdco’s objection to the fee applications of Leech Tishman Robinson Brog, PLLC and Robinson Brog Leinwand Greene Genovese & Gluck P.C.

The parties are continuing their discussions and request an extension of the Court’s deadline to respond with respect to any resolution to tomorrow, December 22 at 12:00 p.m.

Respectfully submitted,

/s/ Lori A. Schwartz
Lori A. Schwartz

cc: Robert Richards, Esq.
Lauren Macksoud, Esq.

(via ECF)